

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FOURTH SET OF INTERROGATORIES  
TO UNITED STATES POSTAL SERVICE WITNESS NERI (PR/USPS-T4: 15)

(April 3, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatory. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

This interrogatory is propounded for the purpose of developing intervenor testimony. The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

901 New York Ave, N.W. STE 200  
Washington, DC 20268-0001  
(202) 789-6889; Fax (202) 789-6891  
[christopher.laver@prc.gov](mailto:christopher.laver@prc.gov)

**PR/USPS-T-4-15**

Understanding that any estimate is subject to the current uncertainty over which facilities will be eliminated and how the network will be restructured, please estimate the following:

- a. Percentage of Priority Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two days (if any),
- b. Percentage of Express Mail, by revenue and piece count, which will maintain its current service standard, and the percentage whose standard will be increased by one day,
- c. Percentage of First-Class Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two days (if any),
- d. Percentage of Periodicals mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days ,
- e. Percentage of Standard Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days ,
- f. Percentage of package services mail and piece count, by revenue, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days.
- g. Please confirm that no other categories of mail will be affected by these service standard changes. If you cannot confirm, then for any other category that is affected, please provide an estimate of the percentage of that mail category, by revenue and piece count, which will maintain its current service standard and the percentage whose standard will be increased.